

STATE OF SOUTH CAROLINA

(Caption of Case)
IN RE:

South Carolina Electric and Gas Company -
Annual Review of Base Rates for Fuel Costs of South
Carolina Electric and Gas Company

215833
BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

COPY

DOCKET

Posted: led

NUMBER: 2009 - 2 - E

Dept: S.A.

Date: 3/20/09

Time: 1:30

(Please type or print)

Submitted by: E. Wade Mullins, III

SC Bar Number: 3525

Address: PO Box 61110
Columbia, SC 29260

Telephone: 803-252-7693

Fax: 803-254-5719

Other:

Email: wmullins@bprwm.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)

NATURE OF ACTION (Check all that apply)

- ☒ Electric
☐ Electric/Gas
☐ Electric/Telecommunications
☐ Electric/Water
☐ Electric/Water/Telecom.
☐ Electric/Water/Sewer
☐ Gas
☐ Railroad
☐ Sewer
☐ Telecommunications
☐ Transportation
☐ Water
☐ Water/Sewer
☐ Administrative Matter
☐ Other:

- ☐ Affidavit
☐ Agreement
☐ Answer
☐ Appellate Review
☐ Application
☐ Brief
☐ Certificate
☐ Comments
☐ Complaint
☐ Consent Order
☐ Discovery
☐ Exhibit
☐ Expedited Consideration
☐ Interconnection Agreement
☐ Interconnection Amendment
☐ Late-Filed Exhibit

- ☐ Letter
☐ Memorandum
☐ Motion
☐ Objection
☐ Petition
☐ Petition for Reconsideration
☐ Petition for Rulemaking
☐ Petition for Rule to Show Cause
☐ Petition to Intervene
☐ Petition to Intervene Out of Time
☐ Prefiled Testimony
☐ Promotion
☐ Proposed Order
☐ Protest
☐ Publisher's Affidavit
☐ Report
☐ Request
☐ Request for Certification
☐ Request for Investigation
☐ Resale Agreement
☐ Resale Amendment
☐ Reservation Letter
☐ Response
☐ Response to Discovery
☐ Return to Petition
☐ Stipulation
☐ Subpoena
☐ Tariff
☒ Other: Surrebuttal
Testimony

RETURN TO
SERVICE

supp. due 3/19/09

OK led

BRUNER, POWELL, ROBBINS, WALL & MULLINS, LLC

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E. WADE MULLINS, III, P.A.

BRIAN P. ROBINSON, P.A.

WESLEY D. PEEL, P.A.

JOEY R. FLOYD, P.A.

WILLIAM D. BRITT, JR., P.A.

* Also Admitted in District of Columbia

LEAH EDWARDS GARLAND

March 19, 2009

AUTHOR'S E-MAIL:

WMULLINS@BRUNERPOWELL.COM

VIA HAND DELIVERY

The Honorable Charles L.A. Terreni

Chief Clerk/Administrator

Public Service Commission of South Carolina

101 Executive Center Drive

Columbia, South Carolina 29210

RECEIVED
MAR 19 PM 4:01
SC PUBLIC SERVICE
COMMISSION

**RE: Annual Review of Base Rates for Fuel Costs of South Carolina Electric & Gas Company; Docket No. 2009-2-E
Our File No.: 7-1719-104**

Dear Mr. Terreni:

CMC Steel South Carolina ("CMC Steel") is hereby filing with the Public Service Commission of South Carolina ("Commission") twenty-five (25) copies of the Surrebuttal Testimony of its witness Richard Thomas in the above-referenced matter. As part of the Surrebuttal Testimony of Mr. Thomas, CMC Steel is filing both a public and confidential version of the testimony. The confidential version is filed in a separate and sealed envelope.

During the pendency of this matter, CMC Steel requested, and South Carolina Electric & Gas Company ("SCE&G") provided pursuant to the terms of a Confidentiality Agreement ("Agreement"), certain documents which SCE&G asserts are proprietary, commercially and/or competitively sensitive or confidential or in the nature of a trade secret ("Confidential Information"). As part of the Agreement, CMC Steel agreed to safeguard such information so as to prevent disclosure to any unauthorized person(s). Therefore, CMC Steel respectfully requests that the Commission maintain the confidential version of the testimony under seal and protect the same from disclosure.

RECEIVED

MAR 20 2009

PSC SC
DOCKETING DEPT.

The Honorable Charles L.A. Terreni
March 19, 2009
Page 2 of 2

Thank you in advance for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Wade Mullins, III". The signature is fluid and cursive, with the first name "E." and last name "Mullins" being more prominent.

E. Wade Mullins, III

Damon E. Xenopoulos, Esquire
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, N.W.
8th Floor, West Tower
Washington, D.C. 20007

Counsel to CMC Steel

EWM/rdd
Enclosures
cc: Counsel of Record

PUBLIC VERSION

RECEIVED
2009 MAR 19 PM 4:01
SCE&G PUBLIC SERVICE
SOUTH CAROLINA
COMMISSION

1 SURREBUTTAL TESTIMONY OF
2 RICHARD THOMAS
3 ON BEHALF OF
4 CMC STEEL SOUTH CAROLINA
5 DOCKET NO. 2009-2-E
6 IN RE: ANNUAL REVIEW OF BASE RATES FOR FUEL COSTS
7 OF SOUTH CAROLINA ELECTRIC & GAS COMPANY

8 INTRODUCTION AND PURPOSE

9 Q. PLEASE STATE YOUR NAME, OCCUPATION, AND ADDRESS.

10 A. My name is Richard Thomas. I operate as an independent consultant. My
11 address is 26 Cold Spring Road, Monroe, CT 06468.

12 Q. ARE YOU THE SAME RICHARD THOMAS WHO PREVIOUSLY
13 SPONSORED DIRECT TESTIMONY IN THIS DOCKET ON BEHALF OF
14 CMC STEEL SOUTH CAROLINA?

15 A. Yes, I am.

16 Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

17 A. The purpose of my Surrebuttal Testimony is to respond to the rebuttal testimony
18 filed by SCE&G's witnesses Forrest Hill, Gerhard Haimberger and John Beier on
19 the subject of hedging coal costs.

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

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14 Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

15 A. Yes.

RECEIVED

2009 MAR 19 PM 4: 01

SC PUBLIC SERVICE
COMMISSION

**BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

Docket No. 2009-2-E

In RE:)
)
Annual Review of Base Rates for Fuel)
Costs of South Carolina Electric and Gas) **CERTIFICATE OF SERVICE**
Company)

This is to certify that I have caused to be served this day a copy of the **Surrebuttal**
Testimony of Richard Thomas on behalf of CMC Steel South Carolina via first-class mail,
postage pre-paid, to the persons named below at the addresses set forth below:


Nanette S. Edwards, Counsel
Office of Regulatory Staff
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Columbia, SC 29201

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South Carolina Electric and Gas Company
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Rita D. DeCarlis
Legal Assistant to E. Wade Mullins, III, Esquire
Bruner, Powell, Robbins, Wall & Mullins, LLC
P.O. Box 61110
Columbia, South Carolina 29260

March 19, 2009
Columbia, South Carolina



ATTORNEYS AND COUNSELORS AT LAW

BrunerPowell

BRUNER POWELL ROBBINS WALL & MULLINS, LLC

FACSIMILE TRANSMITTAL SHEET

TO:	Tricia	FROM:	Rita Decarlis
COMPANY:	SC PSC	DATE:	2009-03-20 15:09:07 GMT
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YOUR REFERENCE NUMBER/SUBJECT:	2009-2-E	SENDER'S FAX NUMBER:	18884658015

NOTES/COMMENTS:

Please find attached the revised COS to include Scott Elliott. Thank you.

This communication contains confidential or legally privileged information and is intended only for the use of the individual or entity named above. If you have received this communication in error, please notify us immediately by telephone collect and return the original message to us at the above address via the U.S. Postal Service. We will be glad to reimburse you for postage. Thank you.

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(803) 232-7693

**BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

Docket No. 2009-2-E

In RE:

**Annual Review of Base Rates for Fuel
Costs of South Carolina Electric and Gas
Company**

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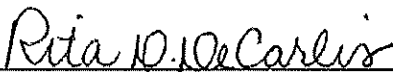
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March 19, 2009
Columbia, South Carolina